

**Elizabeth B. Bloch**

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**From:** Elizabeth B. Bloch  
**Sent:** Thursday, June 5, 2025 3:12 PM  
**To:** Blackwell N. Shelley, Jr.; Lila Shelley; Tim Schulte  
**Cc:** Eric Miller; Alexander C. Landin; Dyamond Jefferies Kerr  
**Subject:** RE: Cook et al., v. Advon Corp

June 10 at 10am Central sounds good. Would you like me to send a Teams or Zoom invite?

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**From:** Blackwell N. Shelley, Jr. <shelley@scs-work.com>  
**Sent:** Thursday, June 5, 2025 1:48 PM  
**To:** Elizabeth B. Bloch <ebb@kullmanlaw.com>; Lila Shelley <lshelley@scs-work.com>; Tim Schulte <schulte@scs-work.com>  
**Cc:** Eric Miller <em@kullmanlaw.com>; Alexander C. Landin <acl@kullmanlaw.com>; Dyamond Jefferies Kerr <Dyamond@scs-work.com>  
**Subject:** RE: Cook et al., v. Advon Corp

**\*\*\* EXTERNAL EMAIL: Exercise caution before clicking on links or opening attachments. \*\*\***

I have attached the Plaintiffs' responses to your second document requests.

I am opposed to putting off the settlement conference any further. Judge Columbell based his order on availability and, I suspect, Advon can provide another person with authority to settle.

I am also opposed to taking the depositions of Mr. Graham and Ms. Carruthers in Florida or by video conference. As you know, Local Rule 30 (A) requires "[a]ny party, or representative of a party (e.g., officer, director, or managing agent), filing a civil action in the proper division of this Court must ordinarily be required, upon request, to submit to a deposition at a place designated within the division." Advon filed this action in this Court and must abide by the rules that Advon selected. If an applicable exception to the Rule applies, please let me know. Otherwise, I will insist on the depositions taking place here.

Let's plan to speak on Tuesday, June 10, at 10:00 a.m., your time regarding these and the other matters you have noted.

Blackwell N. Shelley, Jr.  
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**From:** Elizabeth B. Bloch <[ebb@kullmanlaw.com](mailto:ebb@kullmanlaw.com)>  
**Sent:** Thursday, June 5, 2025 2:20 PM  
**To:** Blackwell N. Shelley, Jr. <[shelley@scs-work.com](mailto:shelley@scs-work.com)>; Lila Shelley <[lshelley@scs-work.com](mailto:lshelley@scs-work.com)>; Tim Schulte <[1](mailto:schulte@scs-</a></p></div><div data-bbox=)

[work.com](mailto:work.com)>

Cc: Eric Miller <[em@kullmanlaw.com](mailto:em@kullmanlaw.com)>; Alexander C. Landin <[acl@kullmanlaw.com](mailto:acl@kullmanlaw.com)>; Dyamond Jefferies Kerr <[Dyamond@scs-work.com](mailto:Dyamond@scs-work.com)>

Subject: RE: Cook et al., v. Advon Corp

Hi, Blackwell,

I am unavailable on Monday, however I have availability on Tuesday after 9:00 am CDT, Wednesday before 1:30pm CDT, and Thursday after 9:00am CDT.

Additionally, Mr. Brooks has notified us that he has developed a conflict with the June 25 Settlement Conference and is unavailable the rest of the week and cannot attend remotely. Because of this, today we notified Judge Colombell's office of the conflict.

As to the supplemental responses to Plaintiffs' discovery, I would like to discuss further so I have a clear understanding of what you are requesting be supplemented.

As for the depositions of Bill Graham and Debbie Carruthers, we can agree to depose them in Florida or remotely. If that is not agreeable, we will file a Motion for Protective Order requesting that relief. Further, as counsel, we are unavailable on June 16. We will also have to circulate dates to Mr. Graham and Ms. Carruthers to confirm their availability.

Please let me know what dates and times work best for you to discuss Plaintiffs' Responses to Advon's Second Set of Requests for Production, any supplemental responses to Plaintiffs' discovery requests by Advon, and the depositions of Mr. Graham and Ms. Carruthers.

Thanks,  
Beth

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From: Blackwell N. Shelley, Jr. <[shelley@scs-work.com](mailto:shelley@scs-work.com)>

Sent: Wednesday, June 4, 2025 10:10 AM

To: Elizabeth B. Bloch <[ebb@kullmanlaw.com](mailto:ebb@kullmanlaw.com)>; Lila Shelley <[lsheley@scs-work.com](mailto:lsheley@scs-work.com)>; Tim Schulte <[schulte@scs-work.com](mailto:schulte@scs-work.com)>

Cc: Eric Miller <[em@kullmanlaw.com](mailto:em@kullmanlaw.com)>; Alexander C. Landin <[acl@kullmanlaw.com](mailto:acl@kullmanlaw.com)>; Dyamond Jefferies Kerr <[Dyamond@scs-work.com](mailto:Dyamond@scs-work.com)>

Subject: RE: Cook et al., v. Advon Corp

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Friday is not good for me, but Monday is open. Meantime, I was planning to discuss with you today your client's deficient production of emails, as confirmed in the 30(b)(6) deposition. In the transcript – pp. 132-137 – Mr. Brooks acknowledges that there are hardly any emails produced from before December 2022. He talked about a data breach but could not say whether the data breach caused emails to be deleted. He was also pretty vague about the methods used to search for the emails that were produced. At page 139, he also acknowledged that Advon had failed to produce all of the CPARS reports. I'd like to

know whether and when Advon will supplement its discovery responses to include the missing emails and the CPARS reports.

I'd also like to schedule depositions of Mr. Graham and Ms. Carruthers here in Richmond. I have some availability the week of June 16 and the week of June 30. Please let me know a day or two that will fit your schedule.

Blackwell N. Shelley, Jr.  
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**From:** Elizabeth B. Bloch <[ebb@kullmanlaw.com](mailto:ebb@kullmanlaw.com)>  
**Sent:** Wednesday, June 4, 2025 10:50 AM  
**To:** Blackwell N. Shelley, Jr. <[shelley@scs-work.com](mailto:shelley@scs-work.com)>; Lila Shelley <[lshelley@scs-work.com](mailto:lshelley@scs-work.com)>; Tim Schulte <[schulte@scs-work.com](mailto:schulte@scs-work.com)>  
**Cc:** Eric Miller <[em@kullmanlaw.com](mailto:em@kullmanlaw.com)>; Alexander C. Landin <[acl@kullmanlaw.com](mailto:acl@kullmanlaw.com)>; Lizabeth Daniels <[liz@scs-work.com](mailto:liz@scs-work.com)>  
**Subject:** RE: Cook et al., v. Advon Corp

Hi, Blackwell,

Considering Plaintiffs' full responses are due tomorrow, I will push the Rule 37 to Friday at 1:00pm CST.

The purpose of the call today was to determine if Plaintiffs intended to produce a privilege log because the responses raised privileges.

Look forward to speaking with you on Friday.

Beth

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**From:** Elizabeth B. Bloch  
**Sent:** Wednesday, May 28, 2025 2:51 PM  
**To:** Blackwell N. Shelley, Jr. <[shelley@scs-work.com](mailto:shelley@scs-work.com)>; Lila Shelley <[lshelley@scs-work.com](mailto:lshelley@scs-work.com)>; Tim Schulte <[schulte@scs-work.com](mailto:schulte@scs-work.com)>  
**Cc:** Eric Miller <[EM@kullmanlaw.com](mailto:EM@kullmanlaw.com)>; Alexander C. Landin <[acl@kullmanlaw.com](mailto:acl@kullmanlaw.com)>; Lizabeth Daniels <[liz@scs-work.com](mailto:liz@scs-work.com)>  
**Subject:** Cook et al., v. Advon Corp

All,

Please see the attached correspondence.

Kindest Regards,  
Beth

**Elizabeth “Beth” Bloch, Esq.**

**She/her/hers**

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